

5. Upon information and belief, Plaintiff seeks to recover damages for an amount in excess of \$75,000.

6. Where there is complete diversity of citizenship between the parties, the amount in controversy is in excess of \$75,000, and this Court has subject matter jurisdiction over this case pursuant to 28 U.S.C. § 1332(a).

7. This is a civil action over which this Court has original jurisdiction pursuant to 28 U.S.C. § 1332, and is one which may be removed to this Court pursuant to 28 U.S.C. § 1441, as this is a civil action between citizens of different states, neither Defendant is a citizen of the State of Texas, and the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

8. The removal of this matter from State to Federal court is proper under 28 U.S.C. § 1446 where the initial pleading sets forth the claim for relief upon which the action is based.

9. That pursuant to 28 U.S.C. § 1446 filed herewith and by reference made a part hereof is a true and correct copy of all process, pleadings, and orders served upon Defendants in this action, attached hereto as Exhibit A

WHEREFORE, Defendants request that this action now pending against them in the 44th Judicial District Court of Dallas County, Texas be removed to the United States District Court, Northern District of Texas, Dallas Division, as it is an action properly removable thereto, and that Defendants be all such other and further relieve to which they may show themselves justly entitled.

Respectfully submitted,

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing has been forwarded to the following counsel of record via facsimile and certified mail, return receipt requested, on this the 9TH day of April, 2013:

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